



Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

September 18, 1996



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HUNTERS POINT
SSIC NO. 5090.3.A

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Engineering Facility Activities, West
Attn: Mr. Richard Powell [1832]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Powell:

PARCEL B DRAFT PROPOSED PLAN HUNTERS POINT

The Department of Toxic Substances Control (Department) received the above report on September, 4 1996. In reviewing the Proposed Plan, the Department has found many areas of concern which require resolution before going further. Some of these issues have already been conveyed to the Navy and some require further elaboration. Given the scope of problem areas, the Department is unable to accept the Parcel B Proposed Plan in its present version. To assist the Navy, we propose to discuss the Proposed Plan in the Parcel B Feasibility Study meeting on September 24, 1996. Some of the problem areas are cleanup goals, scope of mitigation, deed notification, selection of 10^{-4} as a cleanup departure point for carcinogens and cleanup alternatives.

1. In absence of any explanation or justification, the Department cannot accept a cleanup "equivalent to 1×10^{-4} ". This contradicts the regulatory point of departure of 10^{-6} . Pursuant to section 300.430 (e) the 10^{-6} risk level shall be used as the point of departure. The Navy has previously been apprised of this regulatory threshold.
2. It is not sufficient to place notification in a deed. Implementing restrictions will necessitate deed restrictions. In addition, deed restrictions should be consistent with the reuse plan.
3. Section 8, please state what happened to the utility lines such as Fuel and Steam Lines. It is important to clearly explain, in detail, all the actions that will take place in Parcel B.

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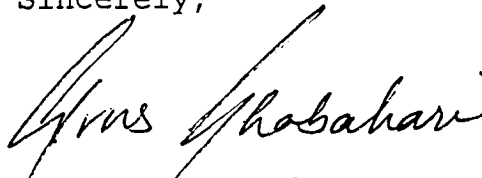
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4. It is not clear how selecting Groundwater Alternative 2 will satisfy the cleanup goals of the HGALs and National Ambient Water Quality Criteria. The Groundwater Alternative 2 includes mitigative measures but it does not explain what they are. Further, it is not clear how monitoring groundwater will prevent high levels of contaminants from getting into the Bay. Although monitoring the groundwater provides useful information on the status of the contamination, it does not reduce the volume and toxicity of contaminants reaching the Bay. Monitoring groundwater does not appear to satisfy the nine criteria established in the NCP.
5. Soil Alternative 6 requires consolidation of treated contaminated soil at IR-1/21. However, it is not clear if this option is technically feasible and consistent with future reuse at Parcel E. It is important to explain the feasibility of such proposal.
6. Please explain the process of thermal desorption. It is important to note that thermal desorption involves incinerating the hazardous waste. This process should be explained thoroughly to the community members for their consideration.

Should you have any questions with respect to this letter, please call me at (510)540-3821.

Sincerely,



Cyrus Shabahari
Project Manager
Office of Military Facilities

cc: Please See Next Page

US EPA
Region IX
Attn: Anna-Marie Cook [H-9-2]
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
2101 Webster Street, Suite 500
Oakland, California 94612

Engineering Facility Activities, West
Attn: Mr. Mike McClelland [62.3]
900 Commodore Drive
San Bruno, California 94066-5006